

CC Docket 95-60

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January 16, 1996

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Kenneth M. Ackerman
Chief, Accounting Systems Branch
Federal Communications Commission
2000 L Street, N.W., Room 812
Washington, D.C. 20554

Re: Expense Limit Data Request CC Docket No. 95-60

Mr. Ackerman,

Attached is Cincinnati Bell Telephone Company's (CBT) updated data for the above proceeding. The data is also provided on the enclosed data disk.

The Federal Communications Commission Data Request dated November 28, 1995, requested data on support asset investments and quantities as of December 31, 1994. CBT provided limited data to you on December 14, 1995. Due to the short turn around time requested, CBT could not provide the level of detail requested in Sections E-H, because some of the data was available only on microfiche. CBT requested additional time to provide this historical data.

CBT is now providing all the data requested as a complete replacement for the worksheets and disk previously provided to you on December 14, 1995.

Please call Steve Abbott at (513) 397-7805 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Peggy A. Peckham".

Peggy A. Peckham
Director - Legislative &
Regulatory Planning

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**CINCINNATI BELL TELEPHONE
RESPONSE TO FCC DATA REQUEST RE: CC 95-60**

CBT received a data request from the FCC for information related to the petition to increase expense limits for certain support assets. Details related to this request can be found in CC Docket 95-60 and the comments filed by CBT and other telcos.

Specifically, the FCC is asking for information on gross investment, accumulated depreciation and the number of items that fall within certain dollar parameters, accounts and jurisdictions (see data request for details). Accounts affected by the petition and the data request are as follows:

<u>Account</u>	<u>Account Description</u>
2112	Motor Vehicles
2113	Aircraft
2114	Special Purpose Vehicles
2115	Garage Work Equipment
2116	Other Work Equipment
2122	Furniture
2123.1	Office Support Equipment
2123.2	Company Communications Equipment
2124	General Purpose Computers

They have also asked that we provide them with information on estimated cost savings associated with this proposed change (on a jurisdictional basis). These amounts will be populated on the diskette that was sent to us by the FCC.

Additionally, the Commission would like us to provide information as to "what types of internal controls you (CBT) have in place for tracking items that are expensed". This question is addressed in the following paragraphs:

CBT certainly understands the Commission's concern for safeguarding those assets that would be written off under a new expensing order. Obviously, one of the benefits that CBT would expect to gain as a result of a higher expensing limit would be a reduction in the amount of recordkeeping required. This does not mean, however, that we would not continue to monitor the existence and performance of these assets.

CBT currently relies on a combination of internal control procedures (such as inventory taking and reconciliation to Part 32 accounts) and physical security measures to control the assets in the accounts covered by the petition. Since continuing property records are not maintained for expense items, the focus for safeguarding these assets would shift to physical security measures.

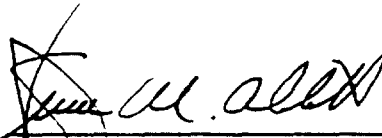
Access to CBT buildings is strictly controlled. Card access security systems are in place to ensure that only CBT employees and approved contractors can gain access to our buildings. These same systems also control and record movement within and between company buildings. CBT office buildings are also monitored by independent security firms.

Due to the nature of the assets covered by the petition, we do not envision a significantly increased potential for loss of assets. To the extent that there is potential for loss, CBT thinks it would be most likely to occur with assets contained in Account 2124, General Purpose Computers. Depending on the expense limit granted, many of the assets in this account would still be subject to certain internal recordkeeping and tracking requirements.

CBT has a department that is dedicated to maintaining the company's general purpose computers. This group is responsible for troubleshooting, establishment of connections, software installation and the physical movement of the computers. It is imperative that this group be aware of the existence and location of company computers in order to provide the services that they offer to other CBT departments.

Also, the accountability issues that are raised by CBT's budgeting process require that each department monitor and insure the existence of the assets covered by this petition. The loss of assets due to inadequate controls will be reflected in a department's performance due to CBT's integration of capital efficiency measures into its budgeting process. Quite simply, there is now an even greater incentive for assuring the existence and performance of the company's assets.

CBT does not view the granting of an increase in the expense limit as a license to ignore its obligation to protect the costs borne by ratepayers. Conversely, we see it as an opportunity to decrease the amount of administrative effort associated with the tracking of assets that can be controlled according to other means.



Steven M. Abbott
Senior Classification Analyst

Section A

ACCOUNT A	DESCRIPTION B	INVESTMENT IN SERVICE (\$000) As of 6/30/95					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles					12843	12843
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment	13	26	32	20	652	743
2116	Other Work Equipment	527	355	594	909	5439	7824
2122	Furniture	11327	754	796	264	1226	14367
2123.1	Office Support Equipment	174	134	182	366	3661	4517
2123.2	Co Communications Equip.	843	595	776	1066	9920	13200
2124	Gen'l Purpose Computers	826	734	870	3007	34032	39469
TOTAL INVESTMENT		13710	2598	3250	5632	67773	92963

Section B

ACCOUNT A	DESCRIPTION B	ACCUMULATED DEPRECIATION (\$000) As of 6/30/95					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles					7447	7447
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment	5	8	9	6	183	211
2116	Other Work Equipment	182	135	198	275	1744	2534
2122	Furniture	4891	304	221	110	510	6036
2123.1	Office Support Equipment	87	68	91	186	1718	2150
2123.2	Co Communications Equip.	609	430	560	770	7166	9535
2124	Gen'l Purpose Computers	540	389	558	1982	19008	22477
TOTAL ACCUM. DEPRECIATION		6314	1334	1637	3329	37776	50390
TOTAL NET INVESTMENT		7396	1264	1613	2303	29997	42573

Section C

		NUMBER OF PLANT ITEMS IN SERVICE As of 6/30/95					TOTAL H=C Thru G
ACCOUNT	DESCRIPTION	\$500 - \$750	\$751 - \$1000	\$1001 - \$1500	\$1501 - \$2000	>\$2000	
A	B	C	D	E	F	G	
2112	Motor Vehicles					814	814
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment	20	31	25	12	47	135
2116	Other Work Equipment	821	399	479	526	1083	3308
2122	Furniture	29913	9283	7220	1547	3610	51573
2123.1	Office Support Equipment	282	157	151	203	482	1275
2123.2	Co Communications Equip.	148	104	139	30	45	466
2124	Gen'l Purpose Computers	1165	849	716	1694	3403	7827
TOTAL	ITEMS IN SERVICE	32349	10823	8730	4012	9484	65398

Section D

ESTIMATED JURISDICTIONAL ADMINISTRATIVE SAVINGS
IF EXPENSE LIMIT CHANGED FROM \$500 TO:

	\$750	\$1000	\$1500	\$2000
	A	B	C	D
TOTAL		Savings estimate provided on Total Company spreadsheet only.		

REGION/COMPANY__Cincinnati Bell__

JURISDICTION__Ohio__

Section E

ACCOUNT A	DESCRIPTION B	INVESTMENTS PURCHASED IN 1993 (\$000)					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles						0
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment		6			71	77
2116	Other Work Equipment	3	25	12	23	273	336
2122	Furniture	79	35	348	16	398	877
2123.1	Office Support Equipment	6	2	10		333	350
2123.2	Co Communications Equip.	12	7			5	23
2124	Gen'l Purpose Computers	19	175	67	247	5,581	6,089
TOTAL INVESTMENT		119	250	437	287	6,660	7,753

Section F

ACCOUNT A	DESCRIPTION B	NUMBER OF PLANT ITEMS PURCHASED IN 1993					TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles						0
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment		8			9	17
2116	Other Work Equipment	4	30	10	13	58	115
2122	Furniture	130	40	336	10	22	538
2123.1	Office Support Equipment	10	2	8		74	94
2123.2	Co Communications Equip.	18	8			1	27
2124	Gen'l Purpose Computers	31	218	48	153	722	1,172
TOTAL ITEMS IN SERVICE		193	306	402	176	886	1,963

Section G

ACCOUNT A	DESCRIPTION B	INVESTMENTS PURCHASED IN 1994 (\$000)					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles						0
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment						0
2116	Other Work Equipment	1	4	9	61	246	320
2122	Furniture	25	4	3		72	104
2123.1	Office Support Equipment	9	2	8	3	102	124
2123.2	Co Communications Equip.	3	6	1			11
2124	Gen'l Purpose Computers	24	56	31	109	3,064	3,284
TOTAL INVESTMENT		63	71	53	173	3,483	3,844

Section H

ACCOUNT A	DESCRIPTION B	NUMBER OF PLANT ITEMS PURCHASED IN 1994					TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles						0
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment						0
2116	Other Work Equipment	2	4	7	33	55	101
2122	Furniture	43	5	3		5	56
2123.1	Office Support Equipment	15	2	7	2	22	48
2123.2	Co Communications Equip.	6	6	1			13
2124	Gen'l Purpose Computers	39	66	25	62	313	505
TOTAL ITEMS IN SERVICE		105	83	43	97	395	723

Section A

ACCOUNT A	DESCRIPTION B	INVESTMENT IN SERVICE (\$000) As of 6/30/95					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles					4659	4659
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment	6	7	13	5	159	190
2116	Other Work Equipment	119	92	192	188	1215	1806
2122	Furniture	268	6	17	0	87	378
2123.1	Office Support Equipment	8	5	17	39	106	175
2123.2	Co Communications Equip.	97	52	84	104	482	819
2124	Gen'l Purpose Computers	62	66	46	88	1435	1697
TOTAL INVESTMENT		560	228	369	424	8143	9724

Section B

ACCOUNT A	DESCRIPTION B	ACCUMULATED DEPRECIATION (\$000) As of 6/30/95					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles					2356	2356
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment	4	3	6	3	61	77
2116	Other Work Equipment	45	44	67	54	391	601
2122	Furniture	80	2	7	0	32	121
2123.1	Office Support Equipment	3	2	5	16	41	67
2123.2	Co Communications Equip.	60	33	53	65	302	513
2124	Gen'l Purpose Computers	30	24	21	43	507	625
TOTAL ACCUM. DEPRECIATION		222	108	159	181	3690	4360
TOTAL NET INVESTMENT		338	120	210	243	4453	5364

REGION/COMPANY Cincinnati BellJURISDICTION Kentucky

Attachment 1

Page 2 of 4

Section C

NUMBER OF PLANT ITEMS IN SERVICE As of 6/30/95

ACCOUNT	DESCRIPTION	\$500 - \$750	\$751 - \$1000	\$1001 - \$1500	\$1501 - \$2000	>\$2000	TOTAL
A	B	C	D	E	F	G	H=C Thru G
2112	Motor Vehicles					235	235
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment	10	8	10	3	11	42
2116	Other Work Equipment	178	102	154	110	278	822
2122	Furniture	2054	71	135	0	114	2374
2123.1	Office Support Equipment	13	5	15	22	28	83
2123.2	Co Communications Equip.	3	7	3	1	7	21
2124	Gen'l Purpose Computers	75	77	39	51	182	424
TOTAL	ITEMS IN SERVICE	2333	270	356	187	855	4001

Section D

ESTIMATED JURISDICTIONAL ADMINISTRATIVE SAVINGS
IF EXPENSE LIMIT CHANGED FROM \$500 TO:

	\$750	\$1000	\$1500	\$2000
	A	B	C	D
TOTAL		Savings estimate provided on Total Company spreadsheet only.		

Section E

ACCOUNT A	DESCRIPTION B	INVESTMENTS PURCHASED IN 1993 (\$000)					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles						0
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment		2				2
2116	Other Work Equipment	1	5	1	2	30	39
2122	Furniture	2		3			5
2123.1	Office Support Equipment	1		1		12	15
2123.2	Co Communications Equip.	1	1			76	77
2124	Gen'l Purpose Computers	3	36	1	2	380	422
TOTAL INVESTMENT		8	43	6	4	497	558

Section F

ACCOUNT A	DESCRIPTION B	NUMBER OF PLANT ITEMS PURCHASED IN 1993					TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles						0
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment		2				2
2116	Other Work Equipment	1	6	1	1	9	18
2122	Furniture	4		2			6
2123.1	Office Support Equipment	2		1		2	5
2123.2	Co Communications Equip.	1	1			1	3
2124	Gen'l Purpose Computers	4	42	1	1	31	79
TOTAL ITEMS IN SERVICE		12	51	5	2	43	113

Section G

ACCOUNT A	DESCRIPTION B	INVESTMENTS PURCHASED IN 1994 (\$000)					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles						0
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment						0
2116	Other Work Equipment		3	23	18	120	163
2122	Furniture						0
2123.1	Office Support Equipment			2		11	13
2123.2	Co Communications Equip.					12	12
2124	Gen'l Purpose Computers	2	1	7	5	125	140
TOTAL	INVESTMENT	2	3	32	23	268	328

Section H

ACCOUNT A	DESCRIPTION B	NUMBER OF PLANT ITEMS PURCHASED IN 1994					TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles						0
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment						0
2116	Other Work Equipment		3	16	10	21	50
2122	Furniture						0
2123.1	Office Support Equipment			2		2	4
2123.2	Co Communications Equip.					2	2
2124	Gen'l Purpose Computers	3	1	6	3	18	31
TOTAL	ITEMS IN SERVICE	3	4	24	13	43	87

Section A

ACCOUNT A	DESCRIPTION B	INVESTMENT IN SERVICE (\$000) As of 6/30/95					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles					17,502	17,502
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment	19	33	45	25	811	933
2116	Other Work Equipment	646	447	786	1,097	6,654	9,630
2122	Furniture	11,595	760	813	264	1,313	14,745
2123.1	Office Support Equipment	182	139	199	405	3,767	4,692
2123.2	Co Communications Equip.	939	647	860	1,171	10,402	14,019
2124	Gen'l Purpose Computers	888	800	916	3,095	35,467	41,166
TOTAL INVESTMENT		14,269	2,826	3,619	6,057	75,916	102,687

Section B

ACCOUNT A	DESCRIPTION B	ACCUMULATED DEPRECIATION (\$000) As of 6/30/95					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles					9,803	9,803
2113	Aircraft						0
2114	Special Purpose Vehicles						0
2115	Garage Work Equipment	9	11	15	9	244	288
2116	Other Work Equipment	226	180	265	329	2,136	3,136
2122	Furniture	4,971	306	228	110	542	6,157
2123.1	Office Support Equipment	89	70	97	203	1,759	2,218
2123.2	Co Communications Equip.	669	462	613	836	7,468	10,048
2124	Gen'l Purpose Computers	570	413	578	2,026	19,514	23,101
TOTAL ACCUM. DEPRECIATION		6,534	1,442	1,796	3,513	41,466	54,751
TOTAL NET INVESTMENT		7,735	1,384	1,823	2,544	34,450	47,936

REGION/COMPANY__Cincinnati Bell__

JURISDICTION__Total Company__

Attachment 1

Page 2 of 4

Section C

		NUMBER OF PLANT ITEMS IN SERVICE As of 6/30/95					TOTAL H=C Thru G
ACCOUNT A	DESCRIPTION B	\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles	0	0	0	0	1,049	1,049
2113	Aircraft	0	0	0	0	0	0
2114	Special Purpose Vehicles	0	0	0	0	0	0
2115	Garage Work Equipment	30	39	35	15	58	177
2116	Other Work Equipment	999	501	633	636	1,361	4,130
2122	Furniture	31,967	9,354	7,355	1,547	3,724	53,947
2123.1	Office Support Equipment	295	162	166	225	510	1,358
2123.2	Co Communications Equip.	151	111	142	31	52	487
2124	Gen'l Purpose Computers	1,240	926	755	1,745	3,585	8,251
TOTAL	ITEMS IN SERVICE	34,682	11,093	9,086	4,199	10,339	69,399

Section D

ESTIMATED JURISDICTIONAL ADMINISTRATIVE SAVINGS
IF EXPENSE LIMIT CHANGED FROM \$500 TO:

	\$750 A	\$1000 B	\$1500 C	\$2000 D
TOTAL	45,000	55,000	58,000	69,000

Section E

ACCOUNT A	DESCRIPTION B	INVESTMENTS PURCHASED IN 1993 (\$000)					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles	0	0	0	0	0	0
2113	Aircraft	0	0	0	0	0	0
2114	Special Purpose Vehicles	0	0	0	0	0	0
2115	Garage Work Equipment	0	8	0	0	71	79
2116	Other Work Equipment	3	30	13	25	303	374
2122	Furniture	82	35	351	16	398	882
2123.1	Office Support Equipment	8	2	11	0	345	365
2123.2	Co Communications Equip.	12	7	0	0	80	100
2124	Gen'l Purpose Computers	22	211	68	249	5,961	6,510
TOTAL INVESTMENT		127	293	443	291	7,158	8,311

Section F

ACCOUNT A	DESCRIPTION B	NUMBER OF PLANT ITEMS PURCHASED IN 1993					TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles	0	0	0	0	0	0
2113	Aircraft	0	0	0	0	0	0
2114	Special Purpose Vehicles	0	0	0	0	0	0
2115	Garage Work Equipment	0	10	0	0	9	19
2116	Other Work Equipment	5	36	11	14	67	133
2122	Furniture	134	40	338	10	22	544
2123.1	Office Support Equipment	12	2	9	0	76	99
2123.2	Co Communications Equip.	19	9	0	0	2	30
2124	Gen'l Purpose Computers	35	260	49	154	753	1,251
TOTAL ITEMS IN SERVICE		205	357	407	178	929	2,076

REGION/COMPANY__Cincinnati Bell__

JURISDICTION__Total Company__

Section G

ACCOUNT A	DESCRIPTION B	INVESTMENTS PURCHASED IN 1994 (\$000)					ACCOUNT TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles	0	0	0	0	0	0
2113	Aircraft	0	0	0	0	0	0
2114	Special Purpose Vehicles	0	0	0	0	0	0
2115	Garage Work Equipment	0	0	0	0	0	0
2116	Other Work Equipment	1	6	31	79	365	483
2122	Furniture	25	4	3	0	72	104
2123.1	Office Support Equipment	9	2	11	3	113	138
2123.2	Co Communications Equip.	3	6	1	0	12	23
2124	Gen'l Purpose Computers	26	57	39	114	3,190	3,424
TOTAL INVESTMENT		65	75	85	196	3,751	4,172

Section H

ACCOUNT A	DESCRIPTION B	NUMBER OF PLANT ITEMS PURCHASED IN 1994					TOTAL H=C Thru G
		\$500 - \$750 C	\$751 - \$1000 D	\$1001 - \$1500 E	\$1501 - \$2000 F	>\$2000 G	
2112	Motor Vehicles	0	0	0	0	0	0
2113	Aircraft	0	0	0	0	0	0
2114	Special Purpose Vehicles	0	0	0	0	0	0
2115	Garage Work Equipment	0	0	0	0	0	0
2116	Other Work Equipment	2	7	23	43	76	151
2122	Furniture	43	5	3	0	5	56
2123.1	Office Support Equipment	15	2	9	2	24	52
2123.2	Co Communications Equip.	6	6	1	0	2	15
2124	Gen'l Purpose Computers	42	67	31	65	331	536
TOTAL ITEMS IN SERVICE		108	87	67	110	438	810